

Annual Report

Number	Permit Section	Question
1	S5.A	<p>Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.</p> <p>Not Applicable</p>
2	S5.A	<p>Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)</p> <p>Saved Document Name: Kelso_SWMP_2020_2_02182020133421</p>
3	S5.A	<p>Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.</p> <p>Yes</p>
4	S5.A.5.b	<p>Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)</p> <p>Yes</p>
4a	S5.A.5.b	<p>Attach a written description of internal coordination mechanisms. (S5.A.5.b).</p> <p>Saved Document Name: Annual Report Question 4a resp_4a_02202020145612</p>
15	S5.C.1.c	<p>Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)</p> <p>Yes</p>
16	S5.C.1.c	<p>From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)</p> <p>Not Applicable</p>
20	S5.C.2	<p>Did you choose to adopt one or more elements of a regional program? (S5.C.2)</p> <p>Yes</p>
20a	S5.C.2	<p>If yes, list the elements, and the regional program.</p> <p>Major emphases in 2019 was to 1) build general awareness about methods to address and reduce impacts from stormwater runoff and 2) effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.</p>
21	S5.C.2	<p>Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.</p> <p>Saved Document Name: General awareness efforts-S5C2_21_02202020141006</p>

22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020) Not Applicable
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii. Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided. Saved Document Name: Stewardship opportunities-S5C2_26a_02202020141006
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a) Kelso held two public meetings of the Kelso Stormwater Advisory Committee whose purpose is to guide the development, implementation and updates to the City's SWMP. These meetings are advertised on the City's website and the public is invited to attend.
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b) Yes
28a	S5.C.3.	List the website address in Comments field. https://www.kelso.gov/engineering/stormwater/stormwater-documents
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii? Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020) Yes
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s). Saved Document Name: Kelso Outfalls_30a_02202020141133
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023) Not Applicable
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021) Not Applicable
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Describe actions in Comments field. (S5.C.5.b)

		Yes
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c. Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i. Yes
35a	S5.C.5	Cite field screening methodology in Comments field. Implemented the City's Municipal Stormwater IDDE Program that incorporates methods outlined in the "IDDE: A Guidance Manual for Program Development and Technical Assessments" and in the "Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual."
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.) 19
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened. Screened four outfalls using the "Outfall Reconnaissance Inventory/Sample Collection Field Sheet."
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.) 19
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii) The hotline telephone number is publicized on the City's website along with a "Stormwater Incident Report" online form to provide an alternate method of communication.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii. Yes
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e. Yes
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f. Yes
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12. Saved Document Name:

43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022) Not Applicable
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) 0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) 0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period. 8
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential? Yes
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. 3
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? No
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)

		Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii) 0
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi) Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d) Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e) Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a? Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022) Not Applicable
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a) No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard. Yes
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control. Not Applicable
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))? Yes
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)

		Yes
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b) Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii) Yes
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) Yes
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) 10
63b	S5.C.7.	Number of facilities inspected during the reporting period. 10
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period. 3
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i. Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii. Not Applicable
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.7.c.iii) Yes
66a	S5.C.7.	Number of known catch basins? 1427
66b	S5.C.7.	Number of catch basins inspected during the reporting period? 692
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? 88
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii. (a)-(c))

		Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d) Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022) Not Applicable
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) Yes
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f) Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022. Not Applicable
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022) Not Applicable
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) Not Applicable
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). Not Applicable
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). Not Applicable
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. Not Applicable
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. Not Applicable

79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? Not Applicable
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) Not Applicable
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A) Not Applicable
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.) Yes
83	S8	Notified Ecology by December 1, 2019 which option you selected: S8.A.2.a, or S8.A.2.b. Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)? Yes
85	S8	Notified Ecology by December 1, 2019 which option you selected: S8.B.2.a, or S8.B.2.b? Yes
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9) Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3) Not Applicable
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A. Not Applicable
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1) Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a. Not Applicable
92	Compliance with	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3

standards and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)

Not Applicable

93 G20 Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)

Not Applicable

94 G20 Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.

Not Applicable

Attachments:

View Files Attached to Submission

DocDescr	DocName	DocExt	DocID	SubID	AppName
WAR045010_4a_02202020145612	Annual Report Question 4a resp_4a_02202020145612	.pdf	901524	1710781	wqwebportal
WAR045010_21_02202020141006	General awareness efforts-S5C2_21_02202020141006	.pdf	901505	1710781	wqwebportal
WAR045010_30a_02202020141133	Kelso Outfalls_30a_02202020141133	.xlsx	901507	1710781	wqwebportal
WAR045010_2_02182020133421	Kelso_SWMP_2020_2_02182020133421	.pdf	900740	1710781	wqwebportal
WAR045010_26a_02202020141006	Stewardship opportunities-S5C2_26a_02202020141006	.pdf	901506	1710781	wqwebportal

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*This SWMP is an attachment to the City's 2019 Annual Report
to the Washington State Department of Ecology for its Phase II NPDES Permit*

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*In compliance with the provisions of
The State of Washington Water Pollution Control Law Chapter 90.48 Revised Code of Washington
and
The Federal Water Pollution Control Act (The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.*

Stormwater Management Program Plan 2020 for

City of Kelso

Prepared for:
City of Kelso, Washington

Prepared by:
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700 Washington Street, Suite 401
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Otak Project No. 17258



January 2015

Updated January 2020 by Van McKay, P.E., City of Kelso

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Abbreviation and Acronyms

AKART	All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment
BMP	Best Management Practice
City	City of Kelso
Ecology	Washington State Department of Ecology
IDDE	Illicit Discharge Detection and Elimination
KMC	Kelso Municipal Code
KSAC	Kelso Stormwater Advisory Committee
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
Permit	Western Washington Phase II Municipal Stormwater Permit
SWMMWW	Stormwater Management Manual for Western Washington
SWMP	Stormwater Management Program Plan
SWPPP	Stormwater Pollution Prevention Plan

CITY OF KELSO STORMWATER MANAGEMENT PROGRAM PLAN 2020

I. INTRODUCTION

I.1 Overview and Background

The City of Kelso (City) operates a municipal separate storm sewer system (MS4) which collects and conveys stormwater runoff from developed areas of the City to surface waters. Discharge of runoff from the MS4 is regulated by the Washington State Department of Ecology (Ecology), and the City is required to obtain a Western Washington Phase II Municipal Stormwater Permit (Permit) to operate the MS4.

The Permit outlines stormwater program activities and implementation milestones that the City must follow to comply with the federal Clean Water Act. As a general permit, the Permit applies to more than 80 MS4s in western Washington. The City was first issued the Permit in 2007 and has been implementing a Stormwater Management Program Plan (SWMP) since that time.

To document progress toward Permit compliance, each permittee is required to develop a SWMP that includes a description of the required activities and is required to implement activities within the required timeframes of the Permit term and submit annual reports to Ecology by March 31st of the following year.

Ecology re-issued the Permit in 2012, and it became effective on August 1, 2013. Ecology then issued a Permit modification on December 17, 2014, which became effective January 16, 2015. The Permit covered a five-year period from August 2013 to July 2018 and Ecology subsequently extended that period to July 2019. Ecology re-issued the Permit July 1, 2019 and the current Permit is effective from August 1, 2019 to July 31, 2024. This SWMP reflects the changes and additional requirements of the current permit.

Stormwater runoff via the MS4 eventually enters the Cowlitz and Coweeman Rivers through a combination of gravity outfalls and pump stations operated by the Diking Improvement District No. 1 and the Consolidated Diking Improvement District No. 3. The City's MS4 also connects to and discharges stormwater to the City of Longview's MS4 and the stormwater is eventually discharged to the Columbia River via a pump station operated by the Consolidated Diking Improvement District No. 1.

In accordance with Permit requirements, the City has developed a SWMP designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), to meet all known, available, and reasonable methods of prevention, control and treatment (AKART) requirements, and to protect water quality. A main goal of the SWMP is to inform the public of the stormwater activities the City plans to achieve during the year. The following sections describe the actions that the City has and will take to comply with the requirements of the Permit.

I.2 Departmental Responsibilities

The Community Development Department employs a full-time Senior Stormwater Engineer, who acts as the City's National Pollutant Discharge Elimination System (NPDES) Coordinator.

The Community Development Department is responsible for general Permit compliance, stormwater public education and outreach, public involvement in stormwater concerns, regulating the entrance of stormwater pollutants into the MS4, regulating runoff on construction sites and developments, developing procedures for compliance with the Permit, planning stormwater capital projects, training staff from other departments, and reporting.

The Operations Department is responsible for spill response, maintaining components of the MS4, and maintaining City properties such as roads, rights-of-way, parks, and municipal buildings in a manner that prevents and reduces stormwater impacts.

Employees in the Police Department are responsible for maintaining awareness of the stormwater system and reporting potential illicit discharges that may be observed during the normal course of their duties in the community.

The City's stormwater utility funds the SWMP and is based on impervious area for commercial properties and on a base rate for residential properties.

I.3 Document Organization

This report comprises the required written documentation of the City's SWMP.

To aid in tracking Permit requirements, this document has been organized into sections that correspond with the Permit Special Conditions and are outlined in the Permit as follows:

- Chapter 2 – Stormwater Management Program
 - 2.1 – Stormwater Planning, Special Condition S5.C.1
 - 2.2 – Public Education and Outreach, Special Condition S5.C.2
 - 2.3 – Public Involvement and Participation, Special Condition S5.C.3
 - 2.4 – MS4 Mapping and Documentation, Special Condition S5.C.4
 - 2.5 – Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5
 - 2.6 – Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6
 - 2.7 – Municipal Operation and Maintenance (O&M), Special Condition S5.C.7
 - 2.8 – Source Control Program for Existing Development, Special Condition S5.C.8
 - 2.9 – NPDES Program Administration
- Chapter 3 – Monitoring and Assessment, Special Condition S8

2. STORMWATER MANAGEMENT PROGRAM

This chapter describes eight required components of the Permit and the City's plan to meet each requirement and administer the program.

2.1 Stormwater Planning, Special Condition S5.C.1

The City will develop and implement a new Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. This program will be carried out by the NPDES Coordinator.

2.1.1 Permit Requirements

Section S5.C.1 requires the following:

- By August 1, 2020, convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Coordinate with long-range plan updates.

2.1.2 Existing Programs and Activities

As this is a new requirement, there is no current program or activities. The City will begin developing the Stormwater Planning program.

2.1.3 Planned Activities

Planned activities for 2020 include:

- Determine the inter-disciplinary team members who will develop the Stormwater Planning program.
- Hold at least one meeting by August 1, 2020 to begin development of the Stormwater Planning program.

2.2 Public Education and Outreach, Special Condition S5.C.2

The City's public education and outreach program focuses on building general awareness among the public of problems created by stormwater runoff and of behavior changes to clean up local surface waters. The program is carried out by the NPDES Coordinator.

2.2.1 Permit Requirements

Section S5.C.2 requires the following:

- Develop and administer an education program to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate

in stewardship activities. The program must target residents, businesses, industry, and city employees at all levels.

- Provide an education and outreach program designed to build general awareness about methods to address and reduce impacts from stormwater runoff.
- Educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

2.2.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Continue to maintain the City's stormwater educational website at <https://www.kelso.gov/engineering/stormwater/stormwater-documents>.
- Continue partnership with Cowlitz Clean Waters that develops a public information and education campaign to inform the Lower Columbia region about the impacts of stormwater runoff on our local waterways and to affect behavior changes and water quality improvements in our communities.
- Track and document all public education and outreach efforts.
- Continue implementation of the education and outreach program for the area served by the MS4.

2.2.3 Planned Activities

Planned activities for 2020 include:

- Select a target audience and a subject area to build general awareness and provide the subject area information to the target audience.
- Continue to develop stewardship opportunities with Kelso High School.
- Collaborate activities with the Cowlitz Clean Water Partners to produce educational materials, including bus ads, pet waste signs, refrigerator magnets and student art/haiku calendars.
- Collaborate with Cowlitz Clean Waters to update the *Solution to Stormwater Pollution* brochure
- Select a target audience and one Best Management Practice (BMP) to affect behavior change.
- By July 1, 2020, conduct a new evaluation of the effectiveness of the ongoing behavior change campaign.

2.3 Public Involvement and Participation, Special Condition S5.C.3

The City's public involvement and participation program is designed to seek regular input from stakeholders through the Kelso Stormwater Advisory Committee (KSAC). The purpose of KSAC is to help guide the development, implementation and updates to the SWMP. KSAC members exhibit an interest in the quality of surface waters within and around Kelso and include a variety of stakeholders. The NPDES Coordinator is a liaison to KSAC and carries out this requirement.

2.3.1 Permit Requirements

Section S5.C.2 requires the following:

- Provide ongoing opportunities for public involvement through advisory councils, public hearings, watershed committees, participation in developing rate structures or other similar activities.
- Create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the Permittee's Stormwater Management Action Plan (SMAP) and its SWMP.
- Make the SWMP document and Annual Report available to the public on the City's website by May 31. Any other submittals required by Ecology also must be available on the website.

2.3.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Holds quarterly public meetings of KSAC.
- Seeks public input through the City Council.
- Posts annual reports, the SWMP, and other stormwater-related documents to the City's website.
- Tracks and documents public involvement and participation efforts.

2.3.3 Planned Activities

Planned activities for 2020 include:

- Continue to hold quarterly meetings of KSAC.
- Continue to post KSAC meeting minutes to the City's website
- Post the 2020 SWMP to the City's website by February, 28, 2020.
- Update the SWMP for 2021 by December 31, 2020.

2.4 MS4 Mapping and Documentation, Special Condition S5.C.4

The City must implement an ongoing program for mapping and documenting the MS4.

2.4.1 Permit Requirements

Section S5.C.4 requires the following:

- Ongoing Mapping: Maintain an ongoing program for mapping data for many features such as outfalls, discharge points, receiving waters, BMPs, connections between MS4s, connections to the MS4 after February 16, 2007 and other features.
- New Mapping: Collect size and material for all known MS4 outfalls during normal course of business such as during field screening.
- New Mapping: Complete mapping of all known connections from the MS4 to a privately owned stormwater system by August 1, 2023.
- Map and store points, lines, polygons of the MS4 with fully described mapping standards in a Geographical Information System or in CAD drawings no later than August 1, 2021.
- Make available to Ecology upon request the City's MS4 depicting the items above.

- Provide mapping information upon request to federally recognized Indian Tribes, municipalities and other permittees.

2.4.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Maintains a GIS of the MS4.

2.4.3 Planned Activities

Planned activities for 2020 include:

- Map any new public (City-operated) stormwater treatment and flow control facilities constructed in 2020.
- Map discharge points and new catch basins.
- Research options to improve the City's GIS including online mapping and asset management software as well as budget for purchase of same.

2.5 Illicit Discharge Detection and Elimination (IDDE), Special Condition S5.C.5

The City's stormwater management ordinance prohibits the discharge of anything that is not stormwater, with a few exceptions, into the MS4. The IDDE program guides City responses to spills and to reports of potential discharges to the storm sewer. Staff monitors the system through inspection of priority outfalls. The program is carried out primarily by Community Development, although support for spill response is provided by the Operations Department.

2.5.1 Permit Requirements

Section S5.C.4 requires the following:

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit discharges, connections and improper disposal into the MS4.
- Implement a program for reporting and correcting or removing illicit connections, spills and other illicit discharges. Illicit connections and illicit discharges must be identified through field screening, inspections, source control inspections and other methods.
- Implement an ordinance to prohibit non-stormwater, illicit discharges into the MS4 that includes allowable discharges, conditionally allowable discharges, and escalating enforcement procedures and actions.
- Implement an ongoing program to detect and identify non-stormwater discharges and illicit connections to the MS4, including the following components:
 - Procedures for conducting investigations of the MS4, including field screening and methods for identifying potential sources of illicit discharges and connections.
 - Publicize a hotline or other local telephone number for reporting of spills or other illicit discharges.
 - Provide appropriate training to City field staff on identification and reporting of illicit discharges.
 - Inform public employees, businesses, and the general public of the hazards associated with illicit discharges and improper disposal of waste.

- Implement an ongoing program to address illicit discharges and illicit connections, including the following components:
 - Procedures for characterizing the nature of, and threat posed by, any illicit discharges found by or reported to the City, including evaluating if the discharge must be immediately contained.
 - Procedures for tracing the source of an illicit discharge, including visual inspection and other methods and procedures.
 - Procedures for eliminating the discharge through notification, technical assistance, inspections and the compliance strategy required above.
- Comply with requirements to address illicit discharges found or reported within Permit-established timelines (see S5.C.5.d.iv.).
- Train technical staff that is responsible to conduct these activities.
- Track and maintain records of the activities conducted to meet the requirements of S5.C.5.

2.5.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Follows procedures for detection, reporting, characterization, response, investigation, removal, clean-up, and enforcement of illicit connections and illicit discharges detailed in the *Municipal Stormwater Illicit Discharge Detection and Elimination (IDDE) Program 2015*.
- Contacts the public to provide education and enforcement when illicit discharges are reported or discovered.
- Provides training on IDDE awareness, one time per Permit term unless procedures are updated, to Operations field staff and Police staff.
- Operates the City's stormwater hotline.
- Encourages the public to report illicit discharges, spills, or other stormwater-related issues using the online Stormwater Incident Report at <http://www.kelso.gov/stormwater-incident-report>.
- Tracks illicit discharge reports and responses.
- Tracks and documents required recordkeeping.

2.5.3 Planned Activities

Planned activities for 2020 include:

- Ensure all new field employees are trained in IDDE.
- Continue ongoing activities listed above, including enforcing Kelso Municipal Code (KMC) 13.09.050, responding to illicit discharges and spills, educating the public about the hazards of IDDE through educational enforcement, and providing the public ways to report illicit discharges and spills, including the hotline and an online incident report.
- Follow indicator sampling procedures, when required, in response to illicit discharges discovered during field screening.
- Field screen at least 12% of the MS4 by December 31 of each year for non-stormwater discharges and illicit connections and track the total percentage of the MS4 screened.

2.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites, Special Condition S5.C.6

The City's stormwater regulatory program currently implements standards for temporary erosion control and permanent stormwater control on development, redevelopment, and construction projects greater than 2000 square feet in size. The program is based on the current ordinance that was required by the previous Permit.

2.6.1 Permit Requirements

Section S5.C.6 requires the following:

- Implement and enforce a program to reduce pollutants in stormwater runoff that enters the MS4 from new development, redevelopment and construction site activities.
- Implement an ordinance to address runoff from development, redevelopment and construction site projects. The ordinance shall include the minimum technical requirements, thresholds and definitions found in the Permit appendices.
- Include a permitting process with site plan review, inspection, and enforcement capability to all sites that meet the minimum thresholds in Appendix 1 of the City's Permit, including the following components:
 - Review all stormwater site plans.
 - Inspect, prior to clearing and construction, all permitted development sites that have high potential for sediment transport.
 - Inspect all permitted development sites during construction to verify proper installation of erosion and sediment controls.
 - Inspect all permitted development sites upon completion of construction, and prior to final approval or occupancy, to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is complete and responsibility for maintenance is assigned.
 - An enforcement strategy to respond to issues of non-compliance with above-noted components.
- Make available the link to the electronic *Construction Stormwater General Permit* Notice of Intent (NOI) form and as applicable a link to the electronic *Industrial Stormwater General Permit* NOI.
- Train staff on the new codes, standards, processes and procedures.

2.6.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Enforce existing local stormwater and erosion control codes for development, redevelopment, and construction sites that meet stormwater thresholds.
- Enforce stormwater and erosion control regulations using Ecology's 2014 Stormwater Management Manual for Western Washington (SWMMWW) for sites over 2000 square feet that meet thresholds established in the Permit Appendix 1.
- Review site plans and grading permit applications that meet the SWMMWW Minimum Requirements.

- Make known the NOIs for Construction Activity and Industrial Activity to developers.
- Continue review of development, redevelopment, and construction sites using thresholds established in Appendix 1 of the 2019 permit.
- Continue inspecting regulated sites before, during, and after construction.
- Document all required recordkeeping.

2.6.3 Planned Activities

Planned activities for 2020 include:

- Ensure all Community Development staff are trained on the updated stormwater requirements, provisions and procedures.

2.7 Operation and Maintenance (O&M), Special Condition S5.C.7

The Operations Department operates the MS4 and City properties, including streets, rights-of-way, parks, and municipal buildings. Employees follow procedures to reduce stormwater impacts from City operations. During the Permit term, the City plans to replace more catch basins and replace failing or faulty portions of the MS4.

2.7.1 Permit Requirements

Section S5.C.7 requires the following:

- Implement and document an O&M program with the ultimate goal of preventing or reducing stormwater impacts.
- Implement maintenance standards for components of the municipal separate stormwater system that are at least as protective as those specified in the SWMMWW.
- Conduct annual inspections of City-operated stormwater treatment and flow control and treatment BMPs/facilities, and conduct required maintenance within Permit-established deadlines.
- Spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events and system-wide inspection if spot checks indicate widespread damage. Then conduct required maintenance within Permit-established deadlines.
- Inspect all City-operated catch basins and inlets every two years and clean, if necessary, to comply with maintenance standards of the SWMMWW.
- Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities including but not limited to streets, parking lots, roads, highways, buildings, parks, open space and maintenance yards owned or maintained by the City. Document practices no later than December 31, 2022 of these practices, policies, and procedures.
- Implement an ongoing training program for staff whose job functions may impact stormwater quality. Document the training program.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City that are not covered by an Industrial Stormwater General Permit.
- Maintain records of inspections and maintenance or repair activities.

2.7.2 Existing Programs and Activities

The City's activities in this area are ongoing:

- Annual inspection of City-operated permanent stormwater treatment and flow control facilities.
- Review of inspection and maintenance records submitted to the City of parcels that have stormwater treatment and flow control BMPs permitted under the Permit and spot checks of those facilities.
- Spot check stormwater facilities and flood-prone areas of the conveyance system after rain storms larger than the 24-hour, 10-year storm event.
- Routine street sweeping.
- Clean ditches and culverts as needed.
- Follow City of Kelso *Municipal Stormwater O&M Program 2015* for operation of stormwater facilities, streets, parks and buildings owned or operated by the City.
- Follow City of Kelso *Nutrient, Integrated Pest Management and Herbicide Plan 2015* to guide the use of nutrients and chemicals on City-operated properties and rights-of-way.
- Follow protocols for spills response on City streets and properties in the City of Kelso *Illicit Discharge Detection and Elimination (IDDE) Program 2015*.
- Train new Operations staff on operational source control BMPs for the maintenance yard, City street and property operations, and City parks operations or when the program is modified.
- Maintain the SWPPP for the Operations maintenance yard and conduct quarterly inspections of the yard.
- Document all required recordkeeping.

2.7.3 Planned Activities

Planned activities for 2019 include:

- Implement a catch basin structural repair and replacement program to repair or replace approximately 10 catch basins in 2020.
- Inspect approximately half of City-operated catch basins and maintain those that need it.

2.8 Source Control Program for Existing Development, Special Condition S5.C.8

The Source Control Program is a new requirement of the Permit. The City will develop and implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program will include tasks such as application of operational source control BMPs, inspections of pollutant generating sources at private and public sites, and adopting an ordinance to require source control BMPs.

2.8.1 Permit Requirements

Section S5.C.8 requires the following:

- Adopt and make effective no later than August 1, 2022, an ordinance requiring the application of source control BMPs for pollutant generating sources.

- Establish an inventory identifying publicly and privately owned institutional, commercial and industrial sites that have the potential to generate pollutants to the MS4 no later than August 1, 2022.

2.8.2 Existing Programs and Activities

As this is a new requirement, there is no current program or activities. The City will begin developing the Source Control Program.

2.8.3 Planned Activities

Planned activities for 2020 include:

- Develop the methods and sources to determine an inventory of sites that have the potential to generate pollutants to the MS4.

2.9 NPDES Program Administration

The City's NPDES compliance program requires administration to develop plans and schedules, administer contracts, maintain tracking systems, process payments, and prepare reports.

2.9.1 Planned Activities

Planned activities for 2020 include:

- Submit to Ecology the annual Permit fee.
- Submit to Ecology the 2019 Annual Report and attachments, including the 2020 SWMP by February 28, 2020.
- Post the 2019 Annual Report to City's website by February 28, 2020.
- Maintain records of NPDES activities for each Permit component.

3. MONITORING AND ASSESSMENT

3.1 Stormwater Monitoring

Stormwater monitoring requirements are given in Section S8 of the Permit. The basic requirements for stormwater monitoring include the following:

- For Regional Status and Trends Monitoring, make annual payments into a collective fund to implement regional receiving water status and trends monitoring.
- For Effectiveness and Source Identification Studies, make annual payments into a collective fund to implement effectiveness and source identification studies.

3.1.1 Ongoing Activities

- The City will continue to pay into collective funds to implement both Regional Status and Trends Monitoring and Effectiveness and Source Identification Studies.
- The City will continue to assist in the development of the Quality Assurance Project Plan for southwest Washington.



MEMO

DATE: February 20, 2020

TO: File

FROM: Van McKay, P.E.

RE: Written description of internal coordination mechanisms (Annual Report question 4a)

The City will draft and submit a written description of internal coordination mechanisms in an Annual Report no later than March 31, 2021, as required in Permit Section S5.A.5.b.



MEMO

DATE: February 19, 2020

TO: File

FROM: Van McKay, P.E.

RE: Permit Section S5.C.2.a.i/ii – General awareness efforts conducted by Kelso

Target Audience selected:

General Public with emphasis on school age children

Efforts Conducted:

- 1) The City mailed to random households approximately 1,900 “Solution to Pollution” brochures that described the hazards of stormwater pollution and specific habits to reduce stormwater pollution.
- 2) The City maintained and regularly updated its stormwater website with many documents and videos to educate the public on stormwater pollution and the City’s stormwater management program (SWMP). The documents include annual reports, educational documents and stormwater ordinances. It also includes supporting documents for the SWMP such as the IDDE program, the O&M program and the Operations SWPPP. The City’s stormwater website is located at: <http://stormwater.kelso.gov>.
- 3) The City provided financial support for Earth Day. This support helped fund the Earth Day bag contest. This contest uses art as a vehicle to educate grade-school children on stormwater and water quality issues.
- 4) Cowlitz Clean Waters held its third annual “Solutions to Stormwater Pollution” calendar contest where middle-school students submitted artwork and haikus and won prizes. The City spearheaded the contest and over four thousand (4,000) 2020 calendars were produced and distributed for free. Cowlitz County-wide distribution included school districts, elementary and middle schools, permittee front counters, city halls, libraries and other locations.
- 5) During two days, Van McKay presented on stormwater issues to Kelso School District middle-school students for their Outdoor School sessions.



MEMO

DATE: February 19, 2020

TO: File

FROM: Van McKay, P.E.

RE: Permit Section S5.C.2.a.iii – Stewardship opportunities provided by Kelso

The City teamed with Kelso High School providing students volunteer opportunities to install storm drain markers and to receive community service credits.

City of Kelso Outfalls

UID	Diameter (in)	MATERIAL
OF-49	<null>	Concrete
OF-8	<null>	Concrete
OF-83	87	CMP
OF-82	60	Concrete
OF-103	54	Concrete
OF-4	42	Concrete
OF-11	36	CMP
OF-31	36	Concrete
OF-92	36	Concrete
OF-45	30	Concrete
OF-5	24	<null>
OF-94	24	ADS
OF-40	24	CMP
OF-56	24	CMP
OF-79	24	CMP
OF-7	22	<null>
OF-65	20	CMP
OF-48	18	ABS
OF-46	18	ADS
OF-34	18	CMP
OF-54	18	CMP
OF-14	18	CMP
OF-61	18	CMP
OF-95	18	CMP
OF-42	18	Concrete
OF-47	18	Concrete
OF-53	18	Concrete
OF-58	18	Concrete
OF-18	18	Concrete
OF-84	18	Concrete
OF-101	18	Concrete
OF-76	16	Concrete
OF-10	15	ABS
OF-37	15	CMP
OF-67	15	CMP
OF-100	15	PVC
OF-43	12	ADS
OF-44	12	ADS
OF-57	12	ADS
OF-1	12	ADS
OF-13	12	ADS
OF-23	12	ADS

City of Kelso Outfalls

UID	Diameter (in)	MATERIAL
OF-77	12	ADS
OF-88	12	ADS
OF-107	12	ADS
OF-6	12	CMP
OF-9	12	CMP
OF-12	12	CMP
OF-15	12	CMP
OF-60	12	CMP
OF-62	12	CMP
OF-80	12	CMP
OF-81	12	CMP
OF-86	12	CMP
OF-93	12	CMP
OF-96	12	CMP
OF-97	12	CMP
OF-98	12	CMP
OF-102	12	CMP
OF-28	12	Concrete
OF-36	12	Concrete
OF-38	12	Concrete
OF-52	12	Concrete
OF-59	12	Concrete
OF-20	12	Concrete
OF-24	12	Concrete
OF-26	12	Concrete
OF-69	12	Concrete
OF-70	12	Concrete
OF-72	12	Concrete
OF-74	12	Concrete
OF-78	12	Concrete
OF-87	12	Concrete
OF-89	12	Concrete
OF-41	12	PVC
OF-2	12	PVC
OF-91	12	PVC
OF-22	10	ADS
OF-35	10	CMP
OF-55	10	CMP
OF-99	10	CMP
OF-32	10	Concrete
OF-50	10	Concrete
OF-104	10	Concrete

City of Kelso Outfalls

UID	Diameter (in)	MATERIAL
OF-105	10	Concrete
OF-90	8	ADS
OF-21	8	CMP
OF-66	8	CMP
OF-68	8	CMP
OF-39	8	Concrete
OF-3	8	Concrete
OF-73	8	Concrete
OF-30	8	PVC
OF-27	8	PVC
OF-29	6	ADS
OF-106	6	ADS
OF-16	6	CMP
OF-33	6	Concrete
OF-51	6	Concrete
OF-19	6	Concrete
OF-25	6	Concrete
OF-63	6	Concrete
OF-64	6	Concrete

S5.C.3.e (IDDE Log)

Date In	Inspection, Caller, or Hotline	Spill, Illicit Dump/Dischrg or Connection, or PR Feedback	Caller Information	Location	Problem	Response Date	Discussion of Actions and Resolution (Van McKay unless otherwise noted)	Date Completed	Days to Respond	Days to Conclude	Illicit Discharge or Connectio
1/18/2019	C	S	Redacted	115 Kelso Drive	Gasoline spill at gas pumps	1/18/2019	I received a 1/18/2019 email and ERTS report from Ecology regarding a gasoline spill at the Shell gas station. Upon a site visit, I found traces of oil absorbent material at the gas pumps. The weather was rainy. I did not see an oil sheen or smell gasoline at the pumps, the adjacent pond to the east or the wetland pond to the north. Photos were taken. I spoke with representatives in the convenience store. A customer started filling his gas tank and left it unattended to go to the restroom. Gasoline began spilling to the pavement. The site's representative on the shift immediately contacted Cowlitz Clean Sweep to clean up the spill. This representative may also have called Ecology's spill line. CCW was onsite shortly and cleaned up the spill. They departed shortly before my arrival. As the site's representative acted according to spill protocol, technical assistance was not necessary for this discharge. It was difficult to determine if the spill went offsite to become an illicit discharge.	1/18/2019	0	0	Y
2/12/2019	C	D	Redacted	1011 Harris Street	Rock dumped in a catch basin	2/12/2019	During this mornings rainstorm, B. Hogue called to say there was localized flooding at catch basin #1405 in front of 1011 Harris Street. Rock had been installed in and over the catch basin and was causing blockage and flooding. Upon my arrival, property owner Mr. Lampert was trying to expose the catch basin. He verified that he had put large rocks (cobble) into the catch basin. Later he admitted he previously requested a contractor who was installing a sanitary sewer main nearby, Q4 2016, to dump crushed aggregate on his driveway that covered the catch basin. Operations tried to vac the culvert across Harris Street without success due to blockage near the catch basin. I explained the illicit discharge to Mr. Lambert as part of educational enforcement and gave him a copy of the stormwater management ordinance. He was to clear out the rocks from the catch basin. Operations was to come back later and vac the culvert. Mr. Lambert understood that he was to no longer put pollutants into the catch basin.	2/12/2019	0	0	Y
2/21/2019	C	S	Redacted	Parcel # 242470500	Leak from vehicle, likely diesel, and tracking on road	2/21/2019	Randy Johnson called at 3:45 pm to say that an unknown vehicle spilled what smelled like diesel from the Watkins Tractor storage yard, down Talley Way, and to the freeway. Operations had covered the worst of the spill with sand by the time I arrived at 4:30 pm. I took some photos of Talley Way and S. 13th Ave. I then discussed the illicit discharge with John Boatman of Watkins Tractor. An employee indicated that M&M Transport of Chehalis discharged the fluid from one of their trucks and another employee indicated he first saw the spill at 2:09. In a call with M&M Transport and J. Boatman, they denied having a truck moving at that location during that time period. The following morning, I met with a Chad from M&M Trucking on-site. Phone numbers 360-304-9791 and 360-262-9383. I educated him on the City's IDDE ordinance. He produced daily activity GPS records of their vehicles and they did not indicate that their trucks had movement there the previous day. These records have been scanned. Also a citizen called in the leaking truck and KEPD responded. The truck was off on the shoulder and was pulled over by KEPD. It was a box truck with AC on its back end. KEPD advised the state DOT on the incident. KEPD arrived on the scene at 2:14 pm and closed the report at 2:29 pm. The report is scanned and entered onto the server.	2/22/2019	0	1	Y
3/27/2019	C	D	Redacted	1303 S. 11th	Landscape contractor dumping yard waste into the street	3/28/2019	Mike Meier received a call on a landscaper crew blowing pine needles, sticks, leaves, etc. into the street and this has been going on for a couple of years. The owner of the property is Brady and Katheryn Gurley. I met Brady Gurley onsite and discussed the illicit discharge issue with him. He was aware of the practice of his landscaper discharging yard waste into the street but not that it was an illicit discharge. I discussed the ordinance and the reasons behind its adoption, as well as giving him a copy with pertinent sections circled. He said he would let his landscaper know to not discharge yard waste into the street or he would hire someone else. His landscaper is Justin Guadron, Affordable Landcare, LLC. 360-562-2844. I found out from Justin that he was not aware of the breadth of the illicit discharge ordinance. After technical assistance and educational enforcement, he stated that he won't be leaving yard waste in the streets/stormwater system upon leaving a site.	3/28/2019	1	1	Y

S5.C.3.e (IDDE Log)

Date In	Inspection, Caller, or Hotline	Spill, Illicit Dumpn/Dischrg or Connection, or PR Feedback	Caller Information	Location	Problem	Response Date	Discussion of Actions and Resolution (Van McKay unless otherwise noted)	Date Completed	Days to Respond	Days to Conclude	Illicit Discharge or Connectio
2/7/2020	C	D	Redacted	Ruby Place and Cedar Falls Drive	General Contractor constructing two houses has sediment in road, materials stockpiled in ROW and exposed soils.	2/7/2020	The two houses that were permitted for construction were under 2000 s.f. of impervious surfaces and did not trigger stormwater regulations. However, erosion control is still required on all projects. Contractor failed to install or incorrectly installed best management practices to control sedimentation from exiting sites. Met with Contractor 2-7-2020, first name Alex, at noon. Contractor was given until the next day to remove all sediment and materials from the ROW and until Monday, 2-10-2020 to install best management practices. On Tuesday, VLM inspected the site and found that sediment and stockpiled materials were removed from the ROW; silt fences were installed; and straw was installed on exposed soils. Before and after photos taken.	2/11/2020	0	4	Y